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Attorney for Defendant K-Kel, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JULIE HANNA,)	Case No.: 2:21-cv-00639-JCM-BNW
)	
Plaintiff,)	STIPULATION AND ORDER TO
)	EXTEND TIME FOR
vs.)	DEFENDANT TO FILE
)	REBUTTAL EXPERT
K-KEL, INC., a Nevada Corporation;)	DISCLOSURE
DOES I-X; and ROE Business Entities I-X,)	(Third Request)
)	
Defendants.)	
)	
)	

The parties, by and through their undersigned counsel, hereby stipulate to extend to February 3, 2022 the deadline within which Defendant may file a rebuttal expert disclosure and report. This is the third request for an extension of the rebuttal expert deadline in this matter. The parties are not presently seeking an extension of the overall discovery deadline.

Discovery Completed to Date

The parties have served their Initial Disclosures. Plaintiff has served written discovery to which Defendant has responded. Plaintiff has consented to providing an

1 agreeable form for the release of medical records and Defendant is in the process of
2 preparing subpoenas to various providers.

3 ***Discovery Remaining to Be Completed***

4 Depositions of the Plaintiff, expert witnesses, and various current and former
5 employees and third parties. Plaintiff's Renewed Motion for Leave to File First
6 Amended Complaint (ECF No. 26) is pending, and if granted, could significantly
7 impact discovery with the addition of further parties and claims.
8

9 ***Reasons the Rebuttal Disclosure Could Not Be Made Within the Existing Deadline***

10 Plaintiff served her expert report on November 18, 2021, a week before the
11 Thanksgiving holiday. It is a "Psychiatric Assessment of Julie Hanna" from Ryan S.
12 Shugarman, M.D., located in Alexandria, Virginia. The substance of the report
13 (exclusive of CV, list of publications and list of prior testimony) is 18 pages (single-
14 spaced). The report also references the treatment of Plaintiff by various care
15 providers.
16

17 It took some time for Defendant to digest the report and determine that a
18 rebuttal report could be useful. Defendant also wants to present a rebuttal expert with
19 documentation from the care providers mentioned in the report of Plaintiff's expert.
20

21 The foregoing constitutes good cause for extending the rebuttal expert
22 deadline, and good cause for submitting this extension request within 21 days of the
23 existing discovery deadline.

24 ///

25 ///

26 ///

Date for Completion of Rebuttal Expert Disclosures

February 3, 2022

FISHER & PHILLIPS, LLP

GILBERT EMPLOYMENT
LAW, P.C.

/s/ Scott M. Mahoney, Esq.

/s/ Kathryn Black, Esq.

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IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

December 21, 2021

DATED

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